

The Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

VALVE CORPORATION, a Washington
corporation,

Plaintiff,

vs.

SIERRA ENTERTAINMENT INC. (AKA
SIERRA ON LINE, INC.), a Delaware
corporation; VIVENDI UNIVERSAL GAMES,
INC., a Delaware corporation; and VIVENDI
UNIVERSAL, S.A., a French foreign
corporation,

Defendants.

SIERRA ENTERTAINMENT, INC. (AKA
SIERRA ON LINE, INC.), a Delaware
corporation; and VIVENDI UNIVERSAL
GAMES, INC., a Delaware corporation,

Counter-Claimants,

vs.

VALVE CORPORATION, a Washington
corporation; GABE NEWELL and LISA
MENNEN NEWELL, husband and wife and the
marital community composed thereof; and
SCOTT LYNCH and JULIE LYNCH, husband
and wife and the marital community composed
thereof,

Counterclaim Defendants.

NO. 02-01683

DECLARATION OF KEVIN
CROOK IN SUPPORT OF
DEFENDANTS' MOTION FOR
PROTECTIVE ORDER

*Crook Decl. ISO Defendants' Motion
for Protective Order (02-01683)*

HILLIS CLARK MARTIN &
PETERSON, P.S.

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1 I, Kevin A. Crook, state as follows:

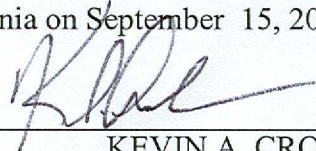
2 1. I have been employed as an in-house paralegal by Defendant Vivendi
3 Universal Games, Inc. ("VUG") since July 1996. In my capacity as a paralegal, I work
4 closely with the employees of Blizzard Entertainment, a division of Davidson & Associates,
5 Inc., a wholly owned subsidiary of VUG ("Blizzard"), on a variety of legal issues. Blizzard
6 is one of VUG's in-house game development studios,

7 2. I have reviewed Valve's Third Motion to Compel Discovery, filed with this
8 Court on August 26, 2004. I have also reviewed Plaintiff Valve's Third Interrogatories To
9 Sierra Entertainment, Inc., Vivendi Universal Games, Inc., and Vivendi Universal, S.A.

10 3. Based on my experience in working with Blizzard on various legal issues, I
11 estimate that Defendants would potentially need to interview a total of 181 people in 14
12 different countries in order to collect documents related to the distribution, licensing or sale
13 of Blizzard games to cyber-café's, as Valve has requested.

14 4. In addition, the financial and customer information that Valve requests for
15 Blizzard and other non-Valve games is not readily available in the industry or to Valve and
16 is kept strictly confidential.

17 I declare under penalty of perjury that the foregoing is true and correct and that this
18 declaration was hereby executed at Los Angeles, California on September 15, 2004.

19 

20 KEVIN A. CROOK